

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

BLAKE DRAPER

on behalf of himself and
all others similarly situated,

Case No. 11-CV-535

Plaintiff,

vs.

CAPTEL, INC.,

Defendant.

**DECLARATION OF ATTORNEY WILLIAM E. PARSONS IN SUPPORT OF
PETITION FOR CLASS COUNSEL'S COSTS AND ATTORNEY'S FEES**

I, William E. Parsons, hereby declare as follows:

1. I am an attorney licensed to practice in Wisconsin and am Class Counsel in the above captioned action.
2. Class Counsel entered into a contingent fee agreement with the named Plaintiff of 33.33% of the settlement or judgment, in addition to repayment of costs.
3. I am a shareholder at Hawks Quindel, S.C., and I have practiced law for over eight years in the state of Wisconsin.
4. I have represented plaintiffs in many matters in front of this Court, and the Eastern District of Wisconsin, including serving as Class Counsel on numerous class and collective action wage and hour disputes. My hourly rate is \$300 per hour. Based on my experience as an attorney in the legal community in Madison, Wisconsin, this is a fair and reasonable hourly rate.

5. I have represented Plaintiffs in numerous individual and class action wage and hour disputes on a contingent fee. The contingent fee entered into in those matters is most commonly 33.33% of the total settlement or judgment. Based on my experience as an attorney in this market, a contingent fee of 33.33% is consistent with the market rate for class action wage and hour cases and is a fair and reasonable fee.

6. Attorney David Zoeller is an associate attorney at Hawks Quindel, S.C. Attorney Zoeller is in his sixth year of practice. Attorney Zoeller has represented plaintiffs in numerous class and collective action wage and hour disputes both while practicing as an associate at Nichols Kaster, PLLP, in Minneapolis, Minnesota, and as an associate at Hawks Quindel, S.C. Attorney Zoeller has served as Class Counsel in multiple matters in front of the Eastern and Western Districts of Wisconsin, as well as matters in front of the Northern and Southern Districts of California, the District of Minnesota, and the Northern District of Oklahoma. Attorney Zoeller's hourly rate is \$275. Based on his experience with class and collective action wage and hour cases and based on the market rates for this kind of work, Attorney Zoeller's rate is reasonable.

7. Attached as Exhibit A is an itemization of Class Counsel's attorney's fees and costs in this matter.

8. Attached as Exhibit B is the order granting class counsel's petition for attorney's fees and costs in Andler v. Associated Banc., Case No. 3:11-cv-79wmc (W.D. Wis.).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 30th, 2012.

/s/ William E. Parsons

William E. Parsons